

EXHIBIT PP

1 Exhibit 140.

2 MS. McCLELLAN: I'm not seeking to enter it. I'm seeking
3 to cross-examine Ms. Sanchez on it.

4 MR. LEUZZI: Are you seeking to use it for—

5 MS. McCLELLAN: Impeachment.

6 MR. LEUZZI: —recollection?

7 MS. McCLELLAN: I'm seeking to use it for impeachment.

8 BY MS. McCLELLAN:

9 Q Ms. Sanchez, can you see the document that I'm showing?

10 A Yes, ma'am.

11 Q Okay. And is this document a—titled in the caption
12 "Declaration of Department Social Worker"?

13 A Yes, ma'am.

14 Q Okay. And on that first page does it start with, "I,
15 Tanessa Sanchez, hereby declare as follows"?

16 A Yes, ma'am.

17 Q And then I'm gonna scroll down to show you the last page of
18 this document. And on Page 5, is that your signature?

19 A Yes, ma'am.

20 Q Okay. And above your signature, is there a statement that
21 you declare under penalty of perjury under the laws of the
22 State of Washington that the foregoing is true and correct?

23 A Yes.

24 Q And is this dated December 6th, 2019?

25 A Yes, ma'am.

1 Q Okay. Now, Ms. Sanchez, did you write this document?

2 A Yes, ma'am.

3 Q Okay. So, in this declaration that you submitted to the court
4 under penalty of perjury, you start this declaration by
5 explaining that in February of 2019 you first met
6 Shaylee Medcraft and her five children. That statement is
7 not true, correct?

8 A Correct.

9 Q You did not meet Ms. Medcraft or the five children until
10 sometime in March of 2019, correct?

11 A Correct.

12 Q Okay. In this declaration—let me back up.

13 This is the declaration that I was referencing earlier
14 that you submitted to the Dependency Court to support removal
15 of the Medcraft children from Ms. Medcraft in December of
16 2019; is that correct?

17 A Correct.

18 Q In this declaration that you provided to the court, you
19 shared with the court that from February to September you
20 completed four separate investigations into concerns for the
21 safety and wellbeing of the children; is that accurate?

22 A Yes.

23 Q Okay. You failed to tell the court that three of those four
24 investigations were unfounded by you at the conclusion of
25 your investigation, correct?

1 A Okay, yes.

2 Q Is that true? You omitted that information in this
3 declaration--

4 A Yes.

5 Q --to the court.

6 A That I admitted what in the--

7 Q You omitted, you did not--

8 A Oh, emit--

9 Q --include information--

10 A --[inaudible].

11 Q --yeah, that three of the four investigations that you
12 concluded were unfounded.

13 A Correct.

14 Q Also, in this declaration--sorry, I apologize.

15 Now, in this declaration, the bottom of Page 3 and top
16 of Page 4, you also told the court that Ms. Medcraft
17 admitted to pulling the children's hair as discipline after
18 receiving services citing it as not being illegal. That was
19 also untrue, correct?

20 A Correct.

21 Q Okay. 'Cause you've testified in this trial multiple times
22 now that Ms. Medcraft denied pulling the children's hair as
23 discipline, correct?

24 A So, yes.

25 Q Okay.